

IN THE UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT

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Nos. 07-4059, 07-4060, 07-4062, 07-4063, 07-4080, 07-4115

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UNITED STATES OF AMERICA,  
Plaintiff-Appellee,

v.

LEARLEY R. GOODWIN, PAULETTE MARTIN, LANORA N. ALI,  
REECE C. WHITING, DERREK L. BYNUM, and LAVON DOBIE,  
Defendants-Appellants.

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ON APPEAL FROM THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

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UNOPPOSED MOTION OF THE UNITED STATES  
FOR LEAVE TO FILE OVERSIZED APPELLEE'S BRIEF

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Pursuant to Fourth Circuit Local Rule 32(b), the United States of America, appellee herein, respectfully requests permission to file an oversized appellee's brief of up to 35,000 words. The reasons for the requested extension are set forth below.

1. Following a three-month jury trial, the six defendants-appellants were each convicted on multiple counts in this large drug trafficking case. Three of the defendants-appellants were sentenced to life imprisonment, and the other three received lengthy prison terms.

2. With the Court's permission, the defendants-appellants filed a consolidated opening page-proof brief of 39,380 words. In that brief, the six defendant-appellants raised 16 issues, many with sub-parts.

3. The page-proof brief of the United States in response to that opening brief is due on February 7, 2011. The undersigned counsel is in the process of drafting the government's brief and estimates that it will take nearly 35,000 words to respond adequately to all of the issues raised by the appellants.

4. I have contacted Michael D. Montemarano, counsel for Paulette Martin and lead appellate counsel for all the appellants. Mr. Montemarano has stated that he would not oppose the government's request to file an oversized appellee's brief of 35,000 words. Mr. Montemarano, as lead counsel for the appellants, represented that he could speak for all the defendants-appellants in that regard.

Wherefore, the United States respectfully requests permission to file an oversized brief of up to 35,000 words in the above-captioned consolidated cases.

Respectfully submitted,

By: /s/ Daniel Steven Goodman  
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January 24, 2011

**CERTIFICATE OF SERVICE**

I, Daniel Steven Goodman, do hereby certify that on January 24, 2011, I caused to be served by the electronic case filing (ECF) system a true and correct PDF copy of the Unopposed Motion of the United States of America for Leave to File Oversized Appellee's Brief upon the following individual:

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